

Nebraska Public Service Commission

COMMISSIONERS:

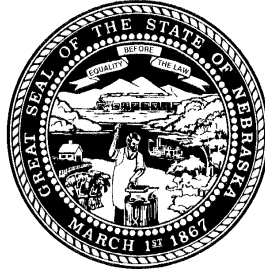
ANNE C. BOYLE

LOWELL C. JOHNSON

ROD JOHNSON

FRANK E. LANDIS

GERALD L. VAP



68508

4927

3101

0254

300 The Atrium, 1200 N Street, Lincoln, NE

Post Office Box 94927, Lincoln, NE 68509-

Website:

www.nol.org/home/NPSC

Phone: (402) 471-

Fax: (402) 471-

NEBRASKA CONSUMER HOTLINE:**EXECUTIVE DIRECTOR:**

ANDY S. POLLOCK

1-800-526-0017

EX PARTE

October 9, 2001

BY ELECTRONIC FILING

Ms. Magalie Roman Salas
Secretary - FCC
445 Twelfth St., SW
Washington, D.C., 20554

Re: Ex Parte Communication
CC Docket No. 99-200 In the Matter of Numbering Resource Optimization

Dear Ms. Salas:

The Nebraska Public Service Commission (Commission) supports the FCC assuming responsibility for establishing and administering a mechanism for recovery of costs of thousand-block number pooling (TBNP) trials ordered by various state regulatory commissions, including the NPSC, under authority delegated to them by the FCC.

Carriers involved in implementing TBNP trials have advised the NPSC that they are spending many millions of dollars to implement TBNP in compliance with state regulatory commission orders issued under delegated authority. A large portion of the costs carriers are incurring are common and not specific to any particular TBNP deployment.

In the various State Delegation Orders issued by the Common Carrier Bureau (CCB) since the FCC's Numbering Resource Optimization Order, the CCB has made clear that the individual state cost-recovery schemes must transition to the national cost-recovery plan when the latter becomes effective. Order, DA 00-1616 ¶ 21; Order, DA 01-386 ¶ 19; Order, DA 01-656 ¶ 20. See also Numbering Resource Optimization Order, 15 FCC Rcd. at 7652-53 ¶ 171.

October 4, 2001

Because the national cost-recovery plan will become effective March 2002, when national TBNP deployment begins, and because any state cost-recovery schemes must transition to the national cost-recovery plan at that time, the Commission believes that it would be in the public interest for the FCC to establish a recovery mechanism designed to recover all the costs of TBNP including state trials and the national TBNP deployment. The FCC is in the best position to determine what costs should be allowed for recovery under the Numbering Resource Optimization Order. Having a single cost recovery mechanism administered by the FCC lessens the administrative burden and cost on carriers by obviating the need to establish separate cost recovery mechanisms in the various states that have ordered TBNP trials only to have those mechanisms transition to the national cost recovery plan less than seven months from now.

Sincerely,

Frank E. Landis
Chairman

cc: Cheryl Callahan
Margaret Dailey
Diane Harmon
Jane Jackson
Sanford Williams